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Attorneys for Defendant  
 AMAZON WEB SERVICES, INC.

ELECTRONICALLY  
**FILED**  
 Superior Court of California,  
 County of San Francisco

**02/05/2025**  
**Clerk of the Court**  
 BY: SANDRA SCHIRO  
 Deputy Clerk

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 IN AND FOR THE COUNTY OF SAN FRANCISCO  
 UNLIMITED JURISDICTION

MAURY BLACKMAN, an individual,

Plaintiff,

v.

SUBSTACK, INC., a Delaware Corporation;  
 AMAZON WEB SERVICES, INC., a Delaware  
 corporation; JACK POULSON, an individual;  
 TECH INQUIRY, INC., a Delaware corporation;  
 DOES 1-25, inclusive,

Defendants.

Case No. CGC-24-618681

**DECLARATION OF SARAH E. BURNS IN  
 SUPPORT OF DEFENDANT AMAZON  
 WEB SERVICES, INC.'S AMENDED  
 MOTION TO FILE PORTIONS OF REPLY  
 IN SUPPORT OF SPECIAL MOTION TO  
 STRIKE PLAINTIFF'S COMPLAINT AND  
 EVIDENTIARY OBJECTIONS UNDER  
 SEAL**

Date: March 3, 2025  
 Time: 9:00 a.m.  
 Dept.: 301

Action Filed: October 3, 2024

**DECLARATION OF SARAH E. BURNS**

I, Sarah E. Burns, declare and state as follows:

1. I am over the age of 18 years old. I am an attorney admitted to practice before all the courts of the State of California and before this Court. I am an associate with the law firm of Davis Wright Tremaine LLP (“DWT”), and I am one of the attorneys representing Defendant Amazon Web Services, Inc. (“AWS”) in this matter. The matters stated below are true of my own personal knowledge, except for those matters stated on information and belief, which I am informed and believe to be true.

2. I submit this declaration in support of AWS’s concurrently-filed Amended Motion to File Portions of Reply in Support of Special Motion to Strike Plaintiff’s Complaint and Evidentiary Objections Provisionally Under Seal.

3. On January 28, 2025, AWS filed its (1) Reply in Support of Special Motion to Strike Plaintiff’s Complaint (“Reply”) and (2) Objections to Plaintiff’s Evidence Submitted in Support of his Opposition to Special Motion to Strike (“Objections”) provisionally under seal pursuant to California Rule of Court 2.551(b)(3)(B). As AWS explained in that motion, AWS did not believe sealing was necessary, but was lodging the documents provisionally under seal to provide Plaintiff with an opportunity to move to seal the documents if he so chose.

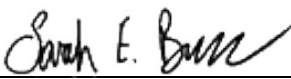
4. Plaintiff opposed that motion, and during a February 4, 2025 hearing on AWS’s SLAPP Motion, the Court directed AWS to file a new version of the Reply and Objections sealing only those portions that contained information Plaintiff had not already made public in his own filings.

5. AWS therefore is concurrently filing new versions of the Reply and Objections that are identical to the previously-filed versions in substance, but are redacted to comply with the Court’s directive regarding sealing.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed February 5, 2025, at Austin, Texas.

  
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Sarah E. Burns